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July 11, 2022

Via ECF

The Honorable Lois Bloom
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Patricia Ranta, et. al. v. City of New York, et. al., 14 Civ. 3794 (FB)(LB)

Your Honor:

I write on behalf of plaintiffs Patricia, Nicholas and Priscilla Ranta in the referenced matter pursuant to the Court's Order of July 7, 2022, directing plaintiffs to file their response to defendants' motion for leave to serve additional interrogatories by noon on July 11, 2022.

Defendants motion should be denied because the information it seeks to obtain from plaintiffs regarding the nine "exoneree" witnesses should be sought from these witnesses. Indeed, defendants sought confirmed addresses from plaintiffs for these witnesses for the purpose of obtaining discovery from them directly. Plaintiffs complied with the Court's Order to provide confirmed contact information. Plaintiffs have also provided all known information regarding these exonerees by providing documentation to the defendants. As the Court is aware, defendants have refused to provide any information about these witnesses to plaintiffs on the grounds that the exoneree cases are sealed. Plaintiffs only know what has been reported in the media, obtained from counsel for said exonerees, or otherwise publicly available through court dockets, and have produced all such information.

If defendants seek additional information, they should obtain it from the witnesses themselves, as they said they would.

We thank the Court for its courtesy and consideration.

Respectfully submitted,

/s/ Peter Dee
Peter Dee, Esq.

cc: All Counsel (via ECF)